

CLARK HILL PLLC
PAOLA M. ARMENI
Nevada Bar No. 8357
Email: parmeni@clarkhill.com
3800 Howard Hughes Pkwy., #500
Las Vegas, Nevada 89169
Tel: (702) 862-8300
Fax: (702) 862-8400
Attorneys for Plaintiffs, Perez Family

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VICTOR PEREZ, as Special Administrator of
the Estate of CARLOS PEREZ, deceased;
VICTOR PEREZ, as the Guardia Ad Litem for
S.E.P., a minor; VICTOR PEREZ, as the Guardia
Ad Litem for A.I.P., a minor,

Plaintiffs,

vs.

STATE OF NEVADA, ex.rel. NEVADA
DEPARTMENT OF CORRECTIONS;
DIRECTOR GREG COX, individually;
WARDEN DWIGHT NEVEN, individually;
ASSISTANT WARDEN TIMOTHY FILSON,
individually; COT. RAMOS, individually;
LIEUTENANT OLIVER, individually;
CORRECTIONS OFFICER CASTRO,
individually; CORRECTIONS OFFICER
SMITH, individually; and DOES I-X, inclusive;
and ROES I-X, inclusive,

Defendants.

CASE NO.: 2:15-cv-01572-APG-DJA

**STIPULATION AND ORDER TO
EXTEND MOTION FOR
SUMMARY JUDGMENT BRIEFING
DEADLINES
(Second Request)**

Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill, Defendant Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., of the law firm of Lewis Brisbois Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada Department of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver, by and through their counsel, Akke Levin, Esq., of the Attorney General's Office, Defendant Isaiah Smith, by and through his counsel of record Jeffrey F. Barr, Esq. of the law firm of Armstrong Teasdale, and Defendant Jeff Castro, by and through his counsel, James A. Beckstrom, Esq., of the law firm of Marquis Aurbach Coffing, hereby respectfully submit this Stipulation and Order Extending Time

for: (1) Plaintiff to Respond to Defendant Corrections Officer Castro's Motion for Summary Judgment [Dkt 146], Defendant Raynaldo-John Ramos' Motion for Summary Judgment [Dkt 147], State of Nevada Ex Rel. Nevada Department of Corrections, James "Greg" Cox, Timothy Filson, Dwight Neven and Ronald Oliver's Motion for Summary Judgment [Dkt 153], and Defendant Isaiah Smith's Motion for Summary Judgment [Dkt 159] all filed on October 25, 2021, which responses are currently due on December 22, 2021, to be extended up to and including January 5, 2022; and (2) all Defendants to file their Replies, currently due on January 21, 2021, to be extended to and including February 4, 2022.

The law firm of Plaintiff's counsel has experienced some unexpected personnel changes. Those personnel changes directly affect the work being done on the Plaintiff's case. As such, Plaintiff's counsel requested a two week extension to file the four Responses to the Defendants' Motions for Summary Judgment. Counsel for the Defendants have no objection to extending the deadline for Responses and the parties further stipulate to extend the date to reply to Plaintiffs' Responses. This request for extension is made in good faith and not for the purposes of delay.

WHEREFORE, the parties stipulate that the time for Plaintiffs to file their Response(s) to Defendant Corrections Officer Castro's Motion for Summary Judgment [Dkt 146], Defendant Raynaldo-John Ramos' Motion for Summary Judgment [Dkt 147], State of Nevada Ex Rel. Nevada Department of Corrections, James "Greg" Cox, Timothy Filson, Dwight Neven and Ronald Oliver's Motion for Summary Judgment [Dkt 153], and Defendant Isaiah Smith's Motion for Summary Judgment [Dkt 159], be extended for two weeks up to and including January 5, 2022 and the time for Defendants to file their Replies be extended to and including February 4, 2022. Respectfully submitted this 13th day of December 2021.

CLARK HILL, PLLC

/s/ Paola M. Armeni, Esq.

PAOLA M. ARMENI
Nevada Bar No. 8357
3800 Howard Hughes Pkwy., #500
Las Vegas, Nevada 89169
Attorneys for Plaintiffs, Perez Family

MARQUIS AURBACH COFFING

/s/ James A. Beckstrom, Esq.

James A. Beckstrom, Esq.
Nevada Bar No. 14032
10001 Park Run Drive
Las Vegas, NV 89145
Attorneys for Defendant Jeffrey Castro

ARMSTRONG TEASDALE

/s/ Jeffrey F. Barr, Esq.

Jeffrey F. Barr, Esq.
Nevada Bar No. 007269
3770 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169
Attorneys for Defendant Isaiah Smith

**LEWIS BRISBOIS BISGAARD &
SMITH LLP**

/s/ Robert W. Freeman, Jr., Esq.

Robert W Freeman, Jr., Esq.
Nevada Bar No. 003062
6385 S. Rainbow Blvd., Ste. 600
Las Vegas, NV 89118
Attorneys for Defendant Raynaldo Ramos

**OFFICE OF THE ATTORNEY
GENERAL**

/s/ Akke Levin, Esq.

Steven Shevorski, Esq.
Nevada Bar No. 008256
Akke Levin, Esq.
Nevada Bar No. 009102
100 N Carson St
Carson City, NV 89701
*Attorneys for Defendants, State of Nevada,
Dwight W. Neven, James Greg Cox
Ronald Oliver, Timothy Filson*

ORDER

IT IS SO ORDERED:

DATED: December 14, 2021



UNITED STATES DISTRICT COURT JUDGE
CASE NO.: 2:15-cv-01572-APG-DJA